



STATE OF UTAH
NATURAL RESOURCES
Oil, Gas & Mining

Norman H. Bangerter, Governor
Dee C. Hansen, Executive Director
Dianne R. Nielson, Ph.D., Division Director

355 W. North Temple • 3 Triad Center • Suite 350 • Salt Lake City, UT 84180-1203 • 801-538-5340

June 18, 1986

CERTIFIED RETURN RECEIPT REQUESTED
(P 402 459 377)

Mr. Alan M. Trbovich
Environmental Engineer
Kennecott
1515 Mineral Square
P. O. Box 11248
Salt Lake City, Utah 84147

Dear Mr. Trbovich:

Re: Initial Completeness Review, "Phase II" of Kennecott's Mining and Reclamation Plan Amendment, UCD Modernization Project, ACT/035/002-II, Salt Lake County, Utah

The Division has completed the initial completeness and technical review of Kennecott's, Utah Copper Division, April 28, and May 27, 1986 submittal(s) which address "Phase II" permitting for the UCD Modernization Project. The application is not complete and the following technical deficiencies must be addressed before the permitting process can continue:

General Comments - DMW

Two previously identified concerns still exist regarding Kennecott's Phase II modernization plan:

1. Insufficient plans for the containment and recovery of potential leaks from the twin 48 inch pipelines.
2. Insufficient details regarding a groundwater monitoring program for the area down gradient of the proposed grinding plant site and pipelines.

However, these concerns are identical to those outlined in items #2 and #3 of the Bureau of Water Pollution Control's (BWPC) letter of April 28, 1986 (attached). To avoid a duplication of effort, the Division will defer to the BWPC for the review and approval of this requested information.

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Upon final BWPC approval, the Division requests that Kennecott submit a copy of the approved plans pertinent to these concerns to be incorporated into the mining and reclamation plan on file.

General Questions - PGL

On page one (1) of the April 28th submission, the operator states that portions of the modernized facilities are located on property currently permitted. The reclamation costs for these facilities must be addressed in the modernization reclamation bond, unless approved as having a viable post-mining land use. These facilities include:

- input crusher
- ore conveyor
- pipeline corridor

Rule M-3 (1)(a) - PGL

Map 712-C-120 shows the disturbed area by the grinding plant. However, the pipeline and ore conveyor were not indicated and should be identified as shown on map #12-C-120. The entire area involved in the modernization must be included in the permit area map. (If these areas were previously permitted, the previous permit area maps may be included in the phase II modernization submittal).

Rule M-3 (2)(d) - JSL

The operator must submit a definitive design and operator plan for all fill material. The manner and extent of how grading, backfilling and compaction of the fill will be accomplished must be described. Include the maximum slopes that are anticipated to be developed. The Geo-technical investigation report, (Sergeant, Hauskins and Beckwith) on page 31 states that cut and fill slopes should be no steeper than 1.5:1. All appropriate design and operation plans that Kennecott intends to implement must be defined.

Rule M-3 (2)(e) - LK

Please clarify the locations of where the post-construction vs. permanent seed mix will be used. If the pipeline will remain following reclamation, the final seed mix should be used along the pipeline corridor.



STATE OF UTAH
DEPARTMENT OF HEALTH

NORMAN H. BANGERTER, GOVERNOR

SUZANNE DANDOO, M.D., M.P.H., EXECUTIVE DIRECTOR

April 28, 1986
533-6146

RECEIVED
MAY 01 1986

Al Trbovich
1515 Mineral Square
P.O. Box 11248
Salt Lake City, Utah 84147

DIVISION OF
OIL, GAS & MINING

RE: UCD Modernization
Kennecott Corporation

Dear Mr. Trbovich:

We have reviewed the revised plans and additional information for the Utah Copper Division (UCD) Modernization Project submitted to us on February 19, 1986.

The following issues still need to be resolved before a construction permit can be issued:

1. The leak detection collection pipes should be extended to allow collection from under the dikes of the process water reservoir. An additional clay or equivalent liner should also be added just beneath the leak detection collector pipes. This will allow the leak detection system time to collect and pump any contaminated water back into the process water reservoir before it has a chance to seep into the ground water.
2. Our concern over leakage from either of the two 48-inch diameter pipelines still exists. We are not in agreement with the statement that "the quantity and quality of water that would be released during an unlikely catastrophic pipeline failure is not likely to cause a surface or ground water quality impact. We agree that the solid materials would probably settle rapidly near the pipeline and could be recovered promptly without a major environmental impact. However, the liquid would not be contained under the proposed design and could therefore pose a serious ground water contamination problem.

As stated previously, both pipelines will be built above the recharge area for the principle aquifer that underlies the Salt Lake Valley, which serves as a major source of the Valley's culinary water supply. We view the potential quantity of contaminated spill water (6.5 million gallons) from the slurry pipeline to be a significant quantity and believe that this water should be contained during a spill and later be put back into the system. The details of your containment and recovery of potential pipeline spills needs to be submitted.

3. The proposed monitoring well at the septic tank drainfield site is not viewed as critical or necessary for ground water protection since the wastewater disposal system is to be located away from culinary water wells and will be near an existing contaminated ground water plume. We recommend that two monitoring wells, one shallow and one deep, be placed down gradient of the proposed grinding plant site and pipelines, and upgradient of the Copperton Wells. These monitoring wells would serve as early warning devices for either ground water contamination clean-up or relocation of the Copperton water supply. The hydrogeology of the area should first be defined, before the location and depths of the monitoring wells are determined.

Since this project has seen many changes and modifications to the original plans and specifications submitted, we request that a final set of plans and specifications be assembled which includes all of the revisions that have been made to date. We also request that two copies be submitted so that we can return one copy to you and still have a copy for our file.

We are hopeful that once these three issues have been addressed adequately and resolved, that a construction permit on the process water reservoir, the slurry (flotation feed) pipeline, the process water pipeline, and the three storm water retention ponds will be issued. Please feel free to contact me, if there are any questions on what is needed.

Sincerely,

Bryon O. Elwell

Bryon O. Elwell
Environmental Engineer
Bureau of Water Pollution Control

BOE:jgh

cc: Kent Miner, Salt Lake County Health Dept.
Linda Moore, Bureau of Public Water Supplies
Don Robinson, Bureau of Air Quality
Wayne Hedberg, Division of Oil, Gas & Mining
Bob Morgan, Division of Water Resources